

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF VERMONT

STATE OF VERMONT,)	
)	
Plaintiff,)	
)	
v.)	
)	
EXXON MOBIL CORPORATION,)	
EXXONMOBIL OIL CORPORATION,)	
ROYAL DUTCH SHELL PLC, SHELL OIL)	Case No. 2:21-cv-260
COMPANY, SHELL OIL PRODUCTS)	
COMPANY LLC, MOTIVA ENTERPRISES)	
LLC, SUNOCO LP, SUNOCO, LLC, ETC)	
SUNOCO HOLDINGS LLC, ENERGY)	
TRANSFER (R&M), LLC, ENERGY)	
TRANSFER LP, and CITGO PETROLEUM)	
CORPORATION,)	
)	
Defendants.)	

PLAINTIFF’S RESPONSE TO DEFENDANTS’ “NOTICE”

Defendants’ March 22, 2022 “Notice” appears to be related to their October 29, 2021 Motion to Stay Proceedings (Doc. 19) pending the outcome of *Connecticut v. Exxon Mobil Corp.*, No. 21-1446 (2d Cir.). As the State previously has explained in opposing that motion, this Court should not wait for the Second Circuit’s decision in *Connecticut* to move forward with this case, as a ruling for Defendants in *Connecticut* would not control here. *See* Plaintiff’s Opposition to Defendants’ Motion to Stay Proceedings (Doc. 30) and Reply in Support of Plaintiff’s Motion to Remand (Doc. 55), at 3-8 & 10 n.3.

DATED: March 25, 2022

Respectfully submitted,

STATE OF VERMONT

THOMAS J. DONOVAN, JR.
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